

**Louisville Metro Air Pollution Control District**  
**850 Barret Ave., Louisville, Kentucky 40204**  
**17 April 2013**

**Construction Statement of Basis**

**Company:** GE Appliances

**Plant Location:** 4000 Buechel Bank Rd, Louisville, Kentucky 40225

**Date Application Received:** 08 March 2013

**Application Number:** 37099

**Date of Draft Permit:** 17 April 2013

**District Engineer:** Emily Tyler

**Permit No:** 37206-13-C

**Plant ID:** 0870

**SIC Code:** 3639

**NAICS:** 33552

**AFS:** 0870

**Introduction:**

This permit will be issued pursuant to District Regulation 2.03, Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits. Its purpose is to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), 1 hr and 8 hr ozone (O<sub>3</sub>), and particulate matter less than 10 microns (PM<sub>10</sub>); and is a non-attainment area for particulate matter less than 2.5 microns (PM<sub>2.5</sub>).

**Application Type/Permit Activity:**

☒ Initial Issuance

☐ Permit Revision

☐ Administrative

☐ Minor

☐ Significant

☐ Permit Renewal

☒ Construction

**Compliance Summary:**

☐ Compliance certification signed

☐ Compliance schedule included

☐ Source is out of compliance

☒ Source is operating in compliance

**I. Source Information**

1. **Product/Process Description:** The source manufactures home laundry appliances, dishwashers and refrigerators.
2. **Project Description:** The source is installing one (1) Cumberland 3250 57050-782 6,000 lb/hr plastic grinder, one (1) Hosokawa 60/140 CL 4,000 lb/hr plastic grinder, three (3) cyclones, and one (1) Kice VR60-10N baghouse in AP-5.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
4. **Emission Unit Summary:**

Construction No.	Equipment Description
37206-13-C	One (1) Cumberland 3250 57050-782 6,000 lb/hr plastic grinder, one (1) Hosokawa 60/140 CL 4,000 lb/hr plastic grinder, three (3) cyclones, and one (1) Kice VR60-10N baghouse to be installed in AP-5.

**5. Permit Revisions:**

Revision No.	Date of Issuance	Public Notice Date	Type	Emission Unit/Page No.	Description
Initial	X/X/2013	4/18/2013	Initial	Entire Permit	Initial Permit Issuance

6. **Fugitive Sources:** There are no fugitive emissions for this project.

**7. Plantwide Emission Summary:**

Pollutant	District Calculated Actual Emissions 2011 Data (tpy)	Major Source Status (based on PTE)
CO	17.19	Yes
NO <sub>x</sub>	26.04	Yes <sup>1</sup>
SO <sub>2</sub>	1.12	No
PM/PM <sub>10</sub>	8.95/7.94	No
VOC	6.86	Yes <sup>2</sup>
Single HAP > 1 tpy		

Pollutant	District Calculated Actual Emissions 2011 Data (tpy)	Major Source Status (based on PTE)
Hydrogen Fluoride	0.00	Yes
<b>Total HAPs</b>	2.78	Yes

Note<sup>1</sup>: Limit taken to not be major for pollutant.

Note<sup>2</sup>: Major for Title V, limit taken to not be major for pollutant for PSD.

**8. Applicable Requirements:**

☐ PSD      ☐ NSPS      ☒ SIP      ☐ MACT  
☐ NSR      ☐ NESHAPS      ☒ District-Origin      ☐ Other

**9. MACT Requirements:**

N/A

**10. Referenced Federal Regulations in Permit:**

N/A

**II. Regulatory Analysis**

**1. Acid Rain Requirements:** The source is not subject to the Acid Rain Program.

**2. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment, and commercial refrigerators. Additionally, in 1995, the source voluntarily substituted a high ozone depleting with a low ozone depleting compound in its refrigerator foaming operation under a "pollution control project" which received formal EPA approval on May 1, 1995.

**3. Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount. If the source becomes subject to 40 CFR 68 and Regulation 5.15, the source shall comply with the Risk Management Program and Regulation 5.15 and submit a Risk Management Plan to:

RMP Reporting Center  
 P.O. Box 3346  
 Merrifield, VA 22116-3346

#### 4. Basis of Regulation Applicability

##### a. Applicable Regulations:

Regulation	Title	Type
2.03	Permit Requirements – Non-Title V Construction and Operating Permits and Demolition/Renovation Permits	SIP
2.16	Title V Operating Permits	SIP
7.08	Standards of Performance for New Process Operations	SIP

##### b. Permit 37206-13-C

##### i. Equipment:

Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
37206-13-C	One (1) Cumberland 3250 57050-782 6,000 lb/hr plastic grinder, one (1) Hosokawa 60/140 CL 4,000 lb/hr plastic grinder, three (3) cyclones, and one (1) Kice VR60-10N baghouse to be installed in AP-5.	7.09	This regulation applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after September 1, 1976

##### ii. Standards/Operating Limits

##### a. PM

PM emissions are limited to 7.09 lb/hr for the 6,000 lb/hr grinder and 5.52 lb/hr for the 4,000 lb/hr grinder per Regulation 7.08, Section 3.1.2.

##### b. Opacity

Visible emissions are limited to 20% opacity per Regulation 7.08, Section 3.1.1.

##### iii. Monitoring and Record Keeping

##### a. PM

A one-time PM compliance demonstration for this

equipment was performed on 3/19/2013 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM emission limits.

b. **Opacity**

A visual inspection of the mechanical and structural integrity of the grinder and cyclone units will ensure the opacity standard is not exceeded.

c. **Emissions Calculation Methodology**

The emission calculations are based on the amount of plastic that goes to the grinders, amount of product returned to the system, and baghouse control efficiency.

iv. **Reporting**

a. **PM**

A one-time PM compliance demonstration for this equipment was performed on 3/19/2013 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM emission limits.

b. **Opacity**

A report of each visual inspection of the mechanical and structural integrity of the grinder and cyclone units will ensure the opacity standard is not exceeded.

**III. Other Requirements**

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Operational Flexibility:** The source did not request any operational flexibility for the emission point.
5. **Compliance History:**

<b>Incident Date(s)</b>	<b>Regulation Violated</b>	<b>Result</b>
12/23/1989	6.16, Section 3 Appliance Coatings	Board Order 5-90
11/21/1990	5.04, Section 6 Standard for Demolition and Renovation; 5.13, Section 4(1), 6, 11, 14, 15 Work Practice	Agreement A-2-92
1/7/1991	2.03, Section 1.a Permit Requirements; 7.25, Section 1.b Performance Standards of Performance For New Sources Using Volatile Organic Compounds	Board Order 2-91
10/31/1991	6.16, Section 5.1 Excess VOC Emissions	Agreement A-14-92
10/30/1992	1.09 Prohibition of Air Pollution	Agreement A-79-92
4/1/1999	1.09 Prohibition of Air Pollution	Settled

6. **Permit Fee:** The construction permit fees are based on potential uncontrolled emissions of less than 50 tons per year, but greater than 10 tons per year of PM in accordance with Regulation 2.08, section 2.5.1.4.
7. **Insignificant Activities:** There are no insignificant activities contained in this construction permit.